1 2 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 6 AT SEATTLE 7 JESSE RODRIGUEZ, on behalf of himself Case No. 2:15-cv-01224-RAJ and all others similarly situated, 8 JOINT STIPULATION TO DISMISS Plaintiff, ACTION WITH PREJUDICE AS TO 9 **DEFENDANT EXPERIAN** v. INFORMATION SOLUTIONS, INC. 10 EXPERIAN INFORMATION SOLUTIONS. INC. AND ALLIANCEONE 11 RECEIVABLES MANAGEMENT, INC., 12 Defendants. 13 Plaintiff Jesse Rodriguez ("Plaintiff") and Defendant Experian Information Solutions, 14 Inc. ("Experian"), hereby move to dismiss the above-entitled action with prejudice as to 15 Plaintiff's claims against Experian. The Parties agree that this Court may proceed to dismiss this 16 action as to Experian only, with prejudice as to the claims brought by Plaintiff and without 17 prejudice as to the claims of the putative class. This Court retains jurisdiction to enforce the 18 settlement of this action. 19 Dated: October 13, 2016 LAW OFFICES OF TODD FRIEDMAN PC 20 By: /s/ Todd Friedman 21 Todd Friedman 324 South Beverly Drive #725 22 Beverly Hills, CA 90212 tfriedman@attorneysforconsumers.com 23 CONCORD LAW P.C. 24 By: /s/ Ryan M. Pesicka 25 Ryan M. Pesicka, WSBA 48182 6608 216th Street SW, Suite 107A 26 Mountlake Terrace, WA 98043 ryan@condordlawseattle.com 27 Attorneys for Plaintiff 28 JONES DAY JOINT STIPULATION TO DISMISS 555 S. FLOWER STREET, 50TH FLR. 2:15-CV-01224-RAJ LOS ANGELES, CA 90071

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1 **JONES DAY** Dated: October 13, 2016 2 By: /s/ Kerry C. Fowler Kerry C. Fowler 3 555 South Flower Street, 50th Floor Los Angeles, CA 90071 4 kcfowler@jonesday.com 5 6 STOEL RIVES, LLP 7 8 By: /s/Rachel L. Dunnington Rachel L. Dunnington, WSBA No. 47021 9 600 University Street, Suite 3600 Seattle, WA 98101 10 Rachel.Dunnington@stoel.com 11 Attorney for Defendant Experian Information Solutions, Inc. 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

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